

# EXHIBIT N

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ANNIE LOIS GRANT, ET AL.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, IN  
HIS OFFICIAL CAPACITY AS  
THE GEORGIA SECRETARY OF  
STATE, ET AL.,

Defendants.

CIVIL ACTION FILE  
NO. 1:22-CV-00122-SCJ

COAKLEY PENDERGRASS,  
ET AL.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER,  
ET AL.

CIVIL ACTION FILE  
NO. 1:21-CV-05339-SCJ

VIDEOTAPED DEPOSITION  
of  
ERICK ALLEN

February 21, 2023  
10:00 a.m.

Taken by Remote Video Conference  
Atlanta, Georgia

ANGELA ADAMS, RPR, CCR-B-1404

1 media to put it out there. So yeah, I don't.

2 And it is also very few because of the way  
3 the maps have been drawn. There are very few  
4 competitive districts where that would even matter. So  
5 if you look at the makeup of a lot of state House  
6 races, a lot of times the candidates are all of one  
7 race. So it is very -- I just don't think it is that  
8 relevant in state legislative races, one, because you  
9 can't get the image out there enough and, two, the  
10 races are somewhat monolithic in the appearance of the  
11 candidate.

12 Q. During your time in the state House or  
13 after, are you aware of needs that black voters in  
14 Georgia have that are different from those of White  
15 voters in Georgia?

16 A. I wouldn't blow it down to the voter. I  
17 would say the communities have differences. Some have  
18 been more underserved than others. Some have been  
19 overresourced. Others have been underresourced. So as  
20 far as the voter, I couldn't say that; but I would say  
21 that there are minority and majority communities that  
22 are or have strong differences.

23 Q. And so speaking then of the communities  
24 specifically, what are some differences that Black  
25 communities and White communities have in terms of the

1 needs of those communities?

2 A. I would say around healthcare. There is a  
3 lot of differences and disparities in the delivery of  
4 healthcare services, education.

5 Minority communities have overwhelmingly  
6 been underfunded, and even in recent years where  
7 funding is what we would consider balanced in the  
8 legislature, you know, you can have School A and School  
9 B both getting the same amount of funds but you have  
10 got School A making decisions on what kind of band  
11 uniforms to buy; whereas, School B is trying to decide  
12 if they want to upgrade their science books from the  
13 80s.

14 So there is a lot of disparities because we  
15 have never focused on catching up communities that have  
16 been so underfunded for, basically, generations; and so  
17 those are real issues in minority underserved  
18 communities opposed to those that have traditionally  
19 had resources, both public and private.

20 Q. While you were in the legislature, did you  
21 find your Republican colleagues -- or I should say  
22 this.

23 Did you explain those different needs of  
24 different communities to Republican colleagues while  
25 you were in the legislature?

1 A. Yes.

2 Q. And did you find those Republican colleagues  
3 to be receptive to what you had to say about the  
4 different needs of different communities in Georgia?

5 A. No.

6 And that's why being in those communities of  
7 interest is so important. They don't have the same  
8 issues. You know, a prime example is legislation I  
9 tried to get passed for allowing local municipalities  
10 and counties to regulate fireworks, and I know this is  
11 a weird example; but for those that are in -- you know,  
12 I will use what we have been talking about.

13 If you are in Bartow County and you are  
14 setting off M16 cherry bombs, whatever those big  
15 fireworks are, on a 5-acre, 12-acre farm, that is  
16 completely different than doing it in an apartment  
17 complex in Smyrna where you have got soldiers with  
18 PTSD, you have got animals that are jumping fences and  
19 running away, you have got kids who are scared, you  
20 have got people calling the police thinking they hear  
21 gunshots and burdening resources in the county.

22 So you can explain certain things to those  
23 legislators, but because of environmental and lived  
24 experience differences, it just doesn't resonate.

25 MR. TYSON: Mr. Videographer, if